

LAW OFFICES OF
MICHAEL K. CHONG LLC
1250 BROADWAY 36TH FL, SUITE 300
NEW YORK, NEW YORK 10001
(212) 726-1104 FAX (212) 726-3104

WWW.MKCLAWGROUP.COM

MICHAEL K. CHONG ‡

‡ MEMBER, NJ BAR, U.S.D.C. NEW JERSEY
SDNY, NEW YORK
EDNY, NEW YORK
U.S.C.A. 2ND CIRCUIT

FORT LEE:
2 EXECUTIVE DRIVE, STE. 720
FORT LEE, NEW JERSEY 07024
(201) 708-6675 FAX (201) 708-6676

* Please Reply to: FORT LEE

HOBOKEN:
300 HUDSON STREET, STE. 10
HOBOKEN, NEW JERSEY 07024
(201) 203-7476 FAX (201) 708-6676

DIRECT DIAL: (201) 947-5200
EMAIL: MKC@MKCLAWGROUP.COM

April 4, 2016

Via ECF

Hon. Steven I. Locke, U.S.M.J.
U.S. Courthouse
100 Federal Plaza, Courtroom 820
Central Islip, NY 11722

Re: Siancas et al. v. Exclusive Detailing Inc. et al.
Docket No.: 2:14-cv-6151

Dear Judge Locke:

As the Court may recall, this office represents Defendants Exclusive Detailing, Inc. in the above-captioned matter. Please accept this correspondence as a response to Plaintiff's counsel, Steven Moser's letter to the Court dated April 1, 2016.

Please be advised that Exclusive Detailing, Inc. is in the process of filing for Chapter 7 protection. Unfortunately, based upon the timing and season of the filing, we are still waiting to receive Exclusive's 2015 Corporate Tax Returns from the accountant in order to file same.

Please further be advised that Michael Agolia, principal of Exclusive Detailing, Inc., and his wife are scheduled for their 341A Meeting on April 15, 2016 whereby the business filing will be addressed before the appointed Trustee, Bruce Atkinson. Accordingly, we respectfully request that any scheduling by the Court in this matter be made post the date for the First Meeting of Creditors in order for us to provide the Court with an accurate status with respect to the Corporate filing.

Should Your Honor have any additional questions and/or concerns, please do not hesitate to contact the undersigned.

Respectfully Submitted,

Michael K. Chong

Michael K. Chong, Esq.

MKC/lh

cc: Plaintiff's counsel
Co-Defendants' counsel / Rallye Motors Defendants
Clients